

REMARKS

Claims 29 through 50 remain pending. In this Response to the non-final Office Action dated November 19, 2007, claims 29-31, 33, 34, 40, 42, and 44 are amended. Care has been taken to avoid the addition of new matter.

All pending claim stand rejected under 35 U.S.C. § 103(a). Claims 29 through 31 and 33 through 49 have been rejected as being unpatentable over U.S. published application 2002/0091572 (*Anderson*) in view of U.S. patent 5,969,318 (*Mackenthun*). Claims 32 and 50 have been rejected as being unpatentable over *Anderson* in view of *Mackenthun* and U.S. patent 7,222,097 (*Bellosguardo*). Favorable reconsideration of the application as now amended is respectfully solicited.

Legal precedent is well developed with respect to 35 U.S.C. §103. Obviousness under 35 U.S.C. §103 must be determined by considering (1) the scope and content of the prior art; (2) ascertaining the differences between the prior art and the claims in issue; and (3) resolving the level of ordinary skill in the pertinent art. The applied prior art references must disclose the claimed features and provide a motivation for combining the applied references. The requisite motivation is not an abstract concept, but must stem from the applied prior art as a whole and have realistically impelled one having ordinary skill in the art, at the time the invention was made, to modify a reference in a specific manner to arrive at a specifically claimed invention with a reasonable expectation of achieving a specific benefit. That is, whether or not the prior art *could* be modified so as to result in the combination defined by the claims, the modification would not have been obvious unless the prior art suggested the desirability of the modification. In the absence of such a prior art suggestion for modification of the references, the basis of the rejection is no more than inappropriate hindsight reconstruction using appellant's claims as a

guide. It is submitted that the prior art does not meet these criteria for any of the claims under rejection.

Claims 29, 42 and 49 are independent. Each of these claims now requires that the database is configured to store a plurality of user profiles, each specifying user account information identifying the prepaid services of a plurality of prepaid service providers. The web portal is configured to transmit the account information stored in a user profile to a respective user. The web portal receives from the respective user a selection of one or more of the prepaid services identified in the transmitted account information. As described at page 4 of the specification, the claimed invention provides the objectives of bundling a variety of prepaid services offered by a plurality of service providers while allowing the subscriber to interact with only one service provider; the subscriber can review and manage the prepaid services online and in real-time.

Anderson discloses a system in which a common customer care interface is provided for both prepaid and postpaid services. As recognized in the Office Action, *Anderson* does not teach providing a particular user a plurality of prepaid services that are offered by a plurality of prepaid service providers. *Mackenthun* teaches generation of a chip card which is applicable to multiple services that can be selected from a menu by a card requester. The data corresponding to the selection(s) are merged into an output file that is transmitted to a card manufacturing apparatus that issues the card.

It is submitted that *Anderson* and *Mackenthun*, taken individually or in combination, would not have suggested a web portal for presenting to a user selection of multiple prepaid services of a plurality of service providers. The references do not teach maintenance of user account information in a respective user profile that identifies the plurality of service providers and the services available and selected. The complexities involved in administering prepaid

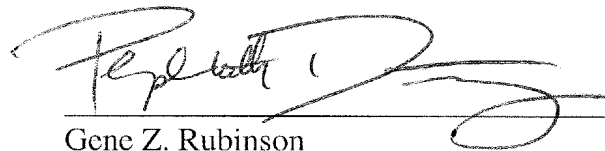
services for a plurality of different providers at one web portal system, in contrast to that of a single provider, is not contemplated by *Anderson*. *Mackenthun* would not direct the artisan to such a modification of *Anderson* as *Mackenthun* is directed to gathering data for issuing a chip card. *Bellosguardo*, which has relied upon for teaching the subject matter recited in dependent claims 32 and 50, does not overcome the deficiency in the prior art teachings.

Accordingly, withdrawal of the rejections of record and allowance of the application is respectfully solicited. To the extent necessary, a petition for an extension of time under 37 C.F.R. §1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 504213, and please credit any excess fees to such deposit account.

Respectfully Submitted,

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